

Louisiana Department of Environmental Quality (LDEQ) Office of Environmental Services

STATEMENT OF BASIS

**Entergy Louisiana LLC
Entergy Louisiana LLC - Waterford 1&2 Generating Plant
Killona St. Charles Parish, Louisiana
Agency Interest Number: 83898
Activity Number: PER20080001
Proposed Permit Number: 2435-V3**

I. APPLICANT

Company:
Entergy Louisiana LLC - Waterford 1&2 Generating Plant
17705 River Rd
Killona, Louisiana 70057

Facility:
Entergy Louisiana LLC
17705 River Rd
Killona, St. Charles Parish, Louisiana
Approximate UTM coordinates are 743.50 kilometers East and 3320.70 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Entergy Louisiana, L.L.C. owns and operates the Waterford 1 & 2 Electric Generating Plant, an existing fossil-fueled steam/electric generation facility. The Entergy Louisiana LLC - Waterford 1& 2 Generating Plant currently operates under Permit No. 2435-V2, issued February 7, 2008.

The facility submitted timely applications for a renewal/modification to the Part 70 and Acid Rain permits and an initial Clean Air Interstate Rule (CAIR) permit.

In addition, Acid Rain Permit 2435-IV2 (February 7, 2008) was also issued to the complex.

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III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Entergy Louisiana, L.L.C. on December 12, 2008, requesting a Part 70 operating permit renewal and an Acid Rain permit renewal. Additional information dated December 15, 2009 and January 25, 2010 was also received. A permit application was submitted by Entergy Louisiana, L.L.C. on June 29, 2007 and February 15, 2010, requesting an initial CAIR permit.

Project

Waterford 1 & 2 is a fossil-fueled steam/electric generating facility. The plant consists of three generating units. Unit 1 boiler uses natural gas as its primary fuel and No. 6 fuel oil as its secondary fuel, and has a maximum heat input of 4,400 (gas) and 3,920 (oil) MM BTU per hour. Unit 2 boiler uses natural gas as its primary fuel and No. 6 fuel oil as its secondary fuel, and has a maximum heat input of 4,400 (gas) and 3,920 (oil) MM BTU per hour. The auxiliary heating boiler burns only natural gas and has a maximum heat input of 77 MM BTU per hour. There are three No. 6 fuel oil storage tanks on site. Permit No. 2435-V2 modified the permit by the addition of a 36 megaWatt dispatching turbine, a 300,000 gallon diesel tank, and a 364 hp diesel generator. The maximum hourly emission rates and HAP emission rates for existing sources were also reconciled. The name of the fuel oil heating boiler was changed to auxiliary heating boiler. The sulfur dioxide and nitrogen oxide emissions from the dispatchable turbine were capped at 39 tons per year each.

In this permit renewal, Entergy proposes to remove EQT019, DG ~ Diesel Generator, from the permit because this unit has not been constructed.

Entergy also proposes to monitor SO₂ and NO_X emissions from the D1 – Dispatchable Turbine using the Low Mass Emission methodology. The low mass emissions (LME) methodology in 40 CFR 75.19 provides an alternative to continuous emission monitors (CEMS) for determining SO₂, NO_X, and CO₂ emissions and unit heat input. To qualify to use the LME methodology, a unit must be gas-fired or oil-fired, and its SO₂ and/or NO_X mass emissions must not exceed certain annual and/or ozone limits. The appropriate LME limits for EQT0016, D1 – Dispatchable Turbine, are 25 tons of SO₂ per year and less than 100 tons of NO_X per year.

Proposed Permit

Permit 2435-V3 will be the renewal of Part 70 operating permit 2435-V2; Permit 2435-IV3 will be the renewal of Acid Rain permit 2435-IV2; and Permit 2435-IR0

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will be the initial CAIR operating permit for the Waterford 1 & 2 Electric Generating Plant.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	2,089.07	2,089.06	- 0.01
SO ₂	37,214.01	37,200.00	- 14.01
NO _x	11,746.32	11,746.21	- 0.11
CO	3,540.87	3,540.85	- 0.02
VOC *	227.75	227.74	-0.01

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Acetaldehyde	< 0.001	-	- < 0.001
Acrolein	< 0.001	-	- < 0.001
Benzene	0.10	0.10	-
1,3-Butadiene	0.004	0.004	-
Dichlorobenzene	0.048	0.048	-
Ethylbenzene	0.016	0.016	-
Formaldehyde	7.902	7.902	-
n-Hexane	74.33	74.33	-
Naphthalene	0.277	0.277	-
POM	0.319	0.319	-
Toluene	1.469	1.469	-
Xylene	0.024	0.024	-
Total	84.489	84.489	

* Other VOC (TPY): 143.25

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,1,1-Trichloroethane	0.056	0.056	-
Arsenic	0.315	0.315	-
Barium	0.608	0.608	-
Beryllium	0.008	0.008	-
Cadmium	0.097	0.097	-
Chromium VI	0.203	0.203	-
Cobalt	1.424	1.424	-
Copper	0.416	0.416	-
Lead	0.359	0.359	-
Manganese	0.915	0.915	-

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<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Mercury	0.028	0.028	-
Nickel	20.01	20.01	-
Phosphorous	2.24	2.24	-
Selenium	0.17	0.17	-
Zinc	6.902	6.902	-
Total	33.751	33.751	

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

The applicability of NSPS Subpart KKKK – Standards of Performance for Stationary Combustion Turbines and NESHAP Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines of EQT016, D-1 – Dispatchable Turbine have been re-evaluated because the turbine has been determined to be an ‘existing’ source. NESHAP YYYY does apply to it however there are no applicable requirements. NSPS KKKK only applies to turbines which commenced construction, modification, or reconstruction after February 18, 2005. Because, it is classified as an existing source, the requirements of NSPS GG - Standards of Performance for Stationary Gas Turbines apply to the turbine.

Applicability and Exemptions of Selected Subject Items

The following tables contain a list of applicable/exempted regulations for the Waterford 1 & 2 Electric Generating Plant.

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I. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III:Chapter												40 CFR 60 NSPS						40 CFR 63 NESHPAP						40 CFR					
		2	5▲	9	11	13	15	2103	2113	22	51*	56	59*	A	D	Dc	GG	K	Kb	KKKK	A	B	YYYY	S2	64	68	72	73	75	96	97
UNF001	W 1 & 2 - Waterford 1 and 2	1	1	1	1	1	1		1	3	2	1	3	1											2	3				1	1
EQT004	C1A - Unit 1 Stack A	1	1	1	1	1	1		2		2														3		2	1	1	1	
EQT006	C1B - Unit 1 Stack B	1	1	1	1	1	1		2		2														3		2	1	1	1	
EQT008	C2A - Unit 2 Stack A	1	1	1	1	1	1		2		2														3		2	1	1	1	
EQT010	C2B - Unit 2 Stack B	1	1	1	1	1	1		2		2														3		2	1	1	1	
EQT012	C3 - Auxiliary Heating Boiler													1	1	3		2		2	1				2		2	3	3	3	
EQT013	T1 - Fuel Oil Storage A													3											3		2				
EQT014	T2 - Fuel Oil Storage B													3											3		2				
EQT015	T3 - Small Fuel Oil Bulk Storage Tank													3											3		2				
EQT016	DI - Dispatchable Turbine													1											3		1				
EQT017	DISU/SD - Dispatchable Turbine Startup/Shutdown													1											3		1				
GRP008	DICAP - Dispatching Turbine CAP													1																	
EQT018	T4 - No. 2 Fuel Oil Storage Tank													3											3		2				

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* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF001	Control of Emissions of Nitrogen Oxides (NOX) [LAC 33:III.2201.A.1]	DOES NOT APPLY. The Waterford 1 & 2 Generating Plant is not located in the Baton Rouge Non-attainment area or Region of Influence.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.2]	EXEMPT. Electric utility steam-generating units are exempt from the requirements of LAC 33:III.Chapter 51 Subchapter A.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.5901]	DOES NOT APPLY. The Waterford 1 & 2 Generating Plant contains no sources which produce, handle, process, or store substances listed in LAC 33:III.5907.A Table A in quantities greater than the listed threshold.
	Compliance Assurance Monitoring [40 CFR 64.2(b)(1)(iii)]	EXEMPT. The Waterford 1 & 2 Generating Plant is subject to Acid Rain requirements.
	Chemical Accident Prevention Provisions [40 CFR 68]	DOES NOT APPLY. The Waterford 1 & 2 Generating Plant contains no sources which produce, handle, process, or store substances listed in 40 CFR 68.130 in quantities greater than the listed threshold.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3]	EXEMPT. Fires Group 1 virgin fossil fuels and Group 2 virgin fossil fuels from a stack that has downwash minimization or approved height.
	40 CFR 60 Subpart D Standards of Performance for Fossil-Fuel-Fired Steam Generators	EXEMPT. Units were constructed prior to August 17, 1971, and have not been modified.
	40 CFR 63 Subpart B Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(e) and 112(j)	DOES NOT APPLY. Steam generating units were constructed prior to the effective date of CAA §112(g)(2)(B) (June 29, 1998) and the effective date of Louisiana's Title V permit program (October 12, 1995). §63.40(b)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT004, EQT006, EQT008, EQT010 (No. 6 Fuel Oil Fired) (Continued)	40 CFR 64 Compliance Assurance Monitoring	EXEMPT per 64.2 (b)(1)(iii)
EQT004, EQT006, EQT008, EQT010 (Natural Gas Fired)	Emission Standards for Sulfur Dioxide Emissions Limitations [LAC 33:III.1503.C] Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3]	EXEMPT. Units emit less than 250 tons per year of sulfur compounds measured as sulfur dioxide and are exempted from the 2000 ppm(v) limitation. Units are subject to recordkeeping requirements of LAC 33:III.1513.C. EXEMPT. Fires Group 1 virgin fossil fuels and Group 2 virgin fossil fuels from a stack that has downwash minimization or approved height.
	40 CFR 60 Subpart D Standards of Performance for Fossil-Fuel-Fired Steam Generators	EXEMPT. Units were constructed prior to August 17, 1971, and have not been modified.
	40 CFR 63 Subpart B Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)	DOES NOT APPLY. Steam generating units were constructed prior to the effective date of CAA §112(g)(2)(B) (June 29, 1998) and the effective date of Louisiana's Title V permit program (October 12, 1995). §63.40(b)
	40 CFR 64 Compliance Assurance Monitoring	EXEMPT per 64.2 (b)(1)(iii)
EQT012 Auxiliary Boiler	Emission Standards for Sulfur Dioxide [LAC 33:III.1502.3] Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3] 40 CFR 60 Subpart D Standards of Performance for Fossil-Fuel-Fired Steam Generators	DOES NOT APPLY. The unit does not have the potential to emit 5 tons per year of SO ₂ . EXEMPT. Fires Group 1 virgin fossil fuels and Group 2 virgin fossil fuels from a stack that has downwash minimization or approved height. EXEMPT. Units were constructed prior to August 17, 1971, and have not been modified.

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ID No:	Requirement	Notes
EQT012 Auxiliary Boiler (Continued)	40 CFR 64 Compliance Assurance Monitoring	EXEMPT per 64.2 (b)(1)(iii)
	Acid Rain Requirements [40 CFR 72, 40 CFR 73, and 40 CFR 75]	DOES NOT APPLY. The boiler is not subject to acid rain requirements as it does not serve a generator that produces electricity. It serves as a heater to increase the temperature of the fuel oil to make it flow to the Waterford 1 and 2 units.
EQT013, EQT014, EQT015 Storage Tanks	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. Storage tanks do not store petroleum liquids. Tanks constructed in 1974.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tanks were constructed prior to July 23, 1984, and have not been modified.
	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	Emission Standards for Sulfur Dioxide Continuous Emissions Monitoring [LAC 33:III.1511.A.]	EXEMPT. Units emit less than 100 tons of SO ₂ per year.
EQT016	Emission Standards for Sulfur Dioxide Emissions Limitations [LAC 33:III.1503]	EXEMPT. Units emit less than 100 tons of SO ₂ per year.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.S105.B.3]	EXEMPT. Fires Group 1 virgin fossil fuels and Group 2 virgin fossil fuels from a stack that has downwash minimization or approved height.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT016 (Continued)	NSPS Subpart KKKK – Standards of Performance for Stationary Combustion Turbines [40 CFR 60.4300]	DOES NOT APPLY. The turbine has not commenced construction, modification, or reconstruction after February 18, 2005.
	NESHAP Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines [40 CFR 63.6090(b)(4)]	APPLIES. NESHAP YYYY is applicable to this turbine. However, existing stationary combustion turbines do not have to meet the requirements of this subpart and of subpart A of this part or submit an initial notification.
EQT018 Fuel Storage Tank	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. Storage tank was constructed in 2007.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b])	DOES NOT APPLY. Storage tank capacity > 39890 gals with a vapor pressure < 0.51 psia
	Storage of Volatile Organic Compounds [LAC 33.III.2103]	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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Prevention of Significant Deterioration/Nonattainment Review

Prevention of Significant Deterioration (PSD) was not required for this permit renewal.

Streamlined Equipment Leak Monitoring Program

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Waterford 1 &2 Generating Plant	Not Applicable	-	-

MACT Requirements

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP).

The Dispatching Turbine meets the existing stationary combustion turbine definition described in the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (Turbine MACT). Existing stationary combustion turbines are not subject to any requirements in the Turbine MACT or Subpart A of Part 63 [40 CFR 63.6090(b)(4)].

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Emissions of Group 1 and Group 2 fossil fuels are exempt from Chapter 51 regulations per LAC 33:III.5105.B.3.

CAIR

The U.S. Court of Appeals for the D.C. Circuit on December 23, 2008 decided to remand to EPA without vacatur the Clean Air Interstate Rule (CAIR). CAIR remains in effect until it is replaced by a rule that remedies the flaws identified by the court in its July 11, 2008 opinion.

Air Quality Analysis

Emissions associated with the proposed renewal were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping

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requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

Entergy Louisiana requested a permit shield which stated that, a permit shield under LAC 33:III.507.I be incorporated into the permit for all federally applicable requirements of the December 11, 2008, application pertaining to (1) New Source Performance Standards; (2) Prevention of Significant Deterioration (PSD); (3) Nonattainment New Source Review (NNSR); and (4) Hazardous Air Pollutants (HAPs).

According to see *Louisiana Guidance for Air Permitting Actions*, Form_7204_r01, 02/26/2008, Pages 130 – 131, Entergy's request for a permit shield must be very specific as to the terms and conditions to be followed for compliance with each of the identified standards. Because the request was not specific under the guidance, the permit shield request presented in the application cannot constitute a valid permit shield request.

Per 40 CFR 60.6(f) and LAC 33:III.507.I.2.a, the permitting authority shall have full discretion in determining whether to grant or deny any permit shield or any portion thereof.

VI. PERIODIC MONITORING

Units C1 and C2 are equipped with a continuous emissions monitoring system (CEMS) as required by 40 CFR 75. The NO_x, O₂, and CO₂ emissions and opacity data is recorded every hour that fuel is combusted.

EQT016, D1 – Dispatching Turbine, shall use the Low Mass Emissions (LME) methodology in 40 CFR 75.19 for determining SO₂, NO_x, and CO₂ emissions and unit heat input.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and

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energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.